

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
UTILITIES COMMISSION**

DOCKET NO. 2014-246-E

<b>In Re: Petition to Establish</b>	)	
<b>Generic Proceeding Pursuant to the</b>	)	
<b>Distributed Energy Resource</b>	)	<b>PETITION TO INTERVENE</b>
<b>Program Act,</b>	)	<b>OF THE ALLIANCE FOR</b>
<b>Act No. 236 of 2014,</b>	)	<b>SOLAR CHOICE</b>
<b>Ratification No. 241,</b>	)	
<b>Senate Bill No. 1189</b>	)	

Pursuant to Public Service Commission Regulation 103-825 and other applicable provisions of the South Carolina Public Service Commission’s (“Commission”) Rules of Practice and Procedure, The Alliance for Solar Choice (“TASC”), through its undersigned counsel, respectfully submits this Petition to Intervene in the above-captioned proceeding. TASC states the following information in support of its Petition:

1. The Alliance for Solar Choice (“TASC”) leads advocacy across the country for the rooftop solar industry. Founded by the largest rooftop solar companies in the United States, TASC represents the vast majority of the market nationwide. Its members include Demeter Power Group, SolarCity Corporation, Solar Universe, Sungevity, Sunrun, and Verengo Solar.

2. TASC was formed on the belief that consumer’s should have the option to switch to onsite solar power for at least a portion of their energy supply. Accordingly, TASC is committed to defending policies, such as net metering, that

provide fair credit to residents, businesses, churches, schools, and public agencies when their rooftop solar systems export power to a utility's grid.

3. The name and address of Petitioner are:

The Alliance for Solar Choice  
595 Market St, 29th Floor  
San Francisco, CA 94105

4. Pursuant to Rule R. 103-804(S) of the Commission's Rules of Practice and Procedure, TASC is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina:

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5. On June 5, 2014, the Office of Regulatory Staff ("ORS") filed a Petition to open this proceeding. The Distributed Energy Resources Program Act ("Act") requires the Commission to open and conduct a generic proceeding for the development of net metering rules, including the consideration of methods of calculating the relative costs and benefits of the net metering program and the "net cost to serve customer-generators." Pursuant to Section 58-40-20(F)(4), the Act states that "[a]ll interested parties shall be allowed to participate" and allows "intervening parties to propose methodologies" to be used in the calculation of any charges or credits for net metering customer-generators.

6. TASC has a direct interest in the methodology for determining the credits or charges for customer-generators, as such methodology will impact the value

consumers receive for installing onsite (i.e., rooftop) solar generation. The value that customer-generators receive will materially impact the number of consumers that choose to contract with third-party owners to participate in net metering as a “customer-generator lessee.”

7. Section 4 of the Act provides the conditions under which third-party owners of renewable electric generation facilities, such as the member companies of TASC, may enter into contractual agreements with consumers in South Carolina to provide services related to the installation, design, operation and maintenance of renewable electric generation facilities. Without implementation of the Act, the legal status of such arrangements is uncertain and third-party owners will continue to lack explicit authorization to operate in South Carolina. Thus, TASC will be directly affected by the decisions from this proceeding.

8. As an intervenor, TASC intends to propose—or to collaboratively participate in the development of—a method of calculating the relative cost and benefits of customer generation in the net metering program. TASC will support its proposal, or justify its support of any consensus proposal, with the testimony of an expert witness and will present that testimony and evidence to the Commission through any evidentiary hearing the Commission schedules for this proceeding.

9. Given TASC’s interest in securing viable net metering policy for the citizens of South Carolina, and the Act’s requirement that intervention in this generic proceeding be granted to “all interested parties,” TASC has standing to intervene. TASC and its member companies are interested parties because they have a direct and material interest in the Commission’s implementation of the Act, as provisions of the

Act have legal and financial impacts on the ability of third-party owners of solar generation facilities to offer services to consumers in South Carolina. No other party will adequately represent the interests of TASC in this proceeding.

**WHEREFORE,** TASC respectfully requests the Commission allow it to intervene in this proceeding and to participate fully as a party, including the ability to appear as a party, conduct discovery and participate in hearings by offering testimony and supporting exhibits, and cross-examining witnesses.

Respectfully Submitted this 31st day of July, 2014.

By: /s/ Joseph M. McCulloch, Jr.  
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<b>In Re: Petition to Establish</b>	)	
<b>Generic Proceeding Pursuant to the</b>	)	
<b>Distributed Energy Resource</b>	)	<b>CERTIFICATE OF</b>
<b>Program Act,</b>	)	<b>SERVICE</b>
<b>Act No. 236 of 2014,</b>	)	
<b>Ratification No. 241,</b>	)	
<b>Senate Bill No. 1189</b>	)	

The undersigned, Joseph M. McCulluch, Jr., Esquire, does hereby certify that he has served the persons listed below with a copy of the **Petition to Intervene of The Alliance for Solar Choice** in the above-captioned proceeding by dispatching a copy to them via U.S. Mail or electronic mail at the addresses listed below on July 31, 2014.

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July 31, 2014  
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